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Counsel for Plaintiffs and the Proposed Classes

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

JILL LEOVY, NICHOLAS GUILAK,
 CAROLINA BARCOS, PAUL MARTIN,
 MARILYN COUSART, ALESSANDRO DE LA
 TORRE, VLADISLAV VASSILEV, JANE
 DASCALOS, and minor G.R., individually, and
 on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 3:23-cv-03440-AMO

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE CASE
 MANAGEMENT CONFERENCE
 AND AUTHORIZE BRIEFS IN
 EXCESS OF DEFAULT PAGE
 LIMITS**

Judge: Hon. Araceli Martínez-Olgún

1 Defendant Google LLC and Plaintiffs Jill Leovy, Nicholas Guilak, Carolina Barcos, Paul
2 Martin, Marilyn Cousart, Alessandro De La Torre, Vladisslav Vassilev, Jane Dascalos, and minor
3 G.R. (collectively, “the Parties”), by and through their respective counsel of record, hereby
4 stipulate as follows:

5 WHEREAS, Plaintiffs filed their original Complaint on July 11, 2023 (ECF No. 1);

6 WHEREAS, Plaintiffs’ original Complaint asserted ten causes of action over 85 pages, on
7 behalf of 8 individual plaintiffs and two putative classes;

8 WHEREAS, the Court granted the Parties’ stipulated request for up to 30 pages for
9 Defendants’ motion to dismiss the original Complaint and Plaintiffs’ opposition to that motion
10 (ECF No. 18);

11 WHEREAS, Defendant filed its motion to dismiss on October 16, 2023 (ECF No. 20);

12 WHEREAS, Plaintiffs elected to file a First Amended Complaint in lieu of opposition to
13 Defendant’s motion to dismiss, and the Court granted the Parties’ stipulated request for Plaintiffs
14 to file a First Amended Complaint by January 5, 2024 (ECF No. 27);

15 WHEREAS, Plaintiffs’ First Amended Complaint (ECF No. 28) adds new allegations,
16 claims, and plaintiffs, asserting 12 causes of action over 137 pages, on behalf of nine individual
17 plaintiffs and three putative classes;

18 WHEREAS, Defendant anticipates moving to dismiss the First Amended Complaint;

19 WHEREAS, the Court so-ordered the Parties’ stipulated briefing schedule for Defendants’
20 anticipated motion to dismiss, with the motion due February 9, 2024; the opposition due March
21 15, 2024; and the reply due April 5, 2024 (ECF No. 30);

22 WHEREAS, in light of the number of allegations and causes of action in the First Amended
23 Complaint compared to the original Complaint, and the Court’s previous allowance of up to 30
24 pages for briefing concerning the original Complaint, the Parties request up to 35 pages for
25 Defendant’s motion to dismiss the First Amended Complaint and Plaintiffs’ opposition brief, and
26 up to 20 pages for Defendants’ reply brief;

27 WHEREAS, the Parties anticipate that the motion to dismiss will be heard on May 16,
28 2024.

1 WHEREAS, lead counsel for Defendant has had a hearing in another matter scheduled on
2 the morning of February 22, 2024, and thus now has a conflict on the date currently set for the
3 Case Management Conference in this matter;

4 WHEREAS, the Parties agree that, in light of the First Amended Complaint and the
5 anticipated motion to dismiss, it would be more efficient and orderly for the Case Management
6 Conference to take place after the hearing on the motion to dismiss;

7 NOW, THEREFORE, pursuant to Civil Local Rules 6-2 and 7-12, the Parties agree, subject
8 to the approval of the Court, as follows:

- 9 1. Defendant may file a memorandum in support of its motion to dismiss the First
10 Amended Complaint of up to 35 pages in length;
 - 11 2. Plaintiffs may file a memorandum in opposition to Defendant's motion to dismiss of
12 up to 35 pages in length;
 - 13 3. Defendant may file a reply memorandum in support of its motion to dismiss of up to
14 20 pages in length;
 - 15 4. the Initial Case Management Conference, currently scheduled for February 22, 2024 at
16 10 a.m., shall be continued to June 6, 2024 at 10 a.m., or such other time as the Court
17 may order at the hearing on the motion to dismiss;
 - 18 5. the Parties' joint case management statement shall be filed by May 30, 2024; and
19 6. the Parties shall make their Rule 26(a) initial disclosures by May 30, 2024.
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Respectfully submitted,

Dated: January 31, 2024

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ David H. Kramer

David H. Kramer
dkramer@wsgr.com

Counsel for Defendant

Dated: January 31, 2024

CLARKSON LAW FIRM
Professional Corporation

By: /s/ Yana Hart

Yana Hart
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Counsel for Plaintiffs and the Proposed Classes

SIGNATURE ATTESTATION

I, David H. Kramer, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer

David H. Kramer

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2024

HON. ARACELI MARTÍNEZ-OLGUÍN
UNITED STATES DISTRICT COURT JUDGE